

**From:** [Cathie Staton](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rule, Appendix B of Part 701  
**Date:** Friday, February 05, 2016 1:40:08 PM

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Dear Secretary of Board Poliquin,

Eglin Federal Credit Union (EFCU) appreciates the National Credit Union Association's (NCUA) initiative to modernize the agency's Field of Membership (FOM). As a Multiple Common Bond Credit Union we recognize the need for regulatory relief to enhance our ability to serve those who desire and need affordable financial services. In 2015, despite all efforts, our net membership growth was .51%. We welcome this opportunity to provide comments on the proposed amending of the rules.

In light of extensive technological advancements members can reap the benefits of Credit Union access at their fingertips regardless of their physical location, the day, or the hour. Expanding "service facility" to include an "online internet channel" would expand our ability to grow membership. An expansion of the "reasonable proximity" rule from 25 to 60 miles would provide EFCU with additional FOM opportunities in the economically interconnected region of Okaloosa, Santa Rosa and Walton counties. [As a side note - We currently have some inconsistency in the FOM descriptor when referencing counties in several of the original SEGs. SEGs have included a various combination of the three county area including Okaloosa, Walton and Santa Rosa. We would welcome guidance on how to bring consistency to several older SEGs to include the footprint of Eglin Air Force Base.]

EFCU strongly supports adding honorably discharged veterans to our Credit Union's common bond. As a member of the Defense Credit Union Council, it is disheartening to turn away veterans who have served and defended our country just because they are not receiving services from Eglin AFB's military hospital. Approval of the proposed change would provide credit union membership to these veterans after their active duty service. This change would be beneficial to both the local veterans and EFCU. Currently, the FOM descriptor wording in our charter for retired federal employees reads "who live in Okaloosa, Santa Rosa or Walton Counties". We would like replicate this FOM descriptor for the honorably discharged veteran's.

The ability to add individuals who are under contract and work regularly for a SEG would expand EFCU membership eligibility to contractors of three area hospitals which are in our current FOM and include; Fort Walton Beach Medical Center, Twin Cities Hospital in Niceville and North Okaloosa Medical Center in Crestview. When attending their employee benefits fairs, we currently have to explain to the contracted employees that they do not qualify for membership. It would be mutually beneficial to add these individuals to our FOM since they regularly work in the hospital, wear a hospital badge and contribute to the well-being of the patients and the success of the hospital.

Adding an office building, shopping mall or an industrial park as a SEG and extending membership eligibility to the employees working for tenants of these entities would also be beneficial to expanding EFCU membership. Most large retailers, whose corporate office is located out of state, prefer to keep their benefits, including credit union affiliation, consistent among all employees. Currently, these local employees fall outside of our FOM. It would be great to offer local credit union services to those employees working in the local area.

In our geographical footprint we rarely receive petition letters from potential SEGs that exceed 3000. Most of our SEGs have fewer than 50 employees. The current rules are agreeable for EFCU.

Again we appreciate NCUA's initiative to modernize the FOM regulations and are thankful for the opportunity to comment on these proposals. EFCU clearly supports the proposed amendments and believes they will help meet the needs of credit unions. For further information, please do not hesitate to contact Cathie Staton at [cstaton@eglinfcu.org](mailto:cstaton@eglinfcu.org) or by phone at 850-862-0111 ext. 1300.

Sincerely,

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